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May 31, 2023

VIA ECF ONLY

The Honorable Ramon E. Reyes
Magistrate, United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. 12175
Brooklyn, New York 11201

RE: Boyd v. Liberty Ashes, Inc. (Case No. 23-cv-0641 (NRM)(RER))

Dear Magistrate Reyes:

As your files should reflect, the undersigned represents Defendants in the above referenced matter. In accordance with your Order of May 11, 2023, please accept this correspondence as the Joint Reply of the Parties.

Payroll documentation was provided by Defendants to Plaintiff, and revised offers and counteroffers were exchanged between the parties, all in a timely manner. While the Plaintiff and Defendant are still apart in their demands, it is the belief of both parties that they would benefit from a Mediation conducted by you. Therefore, it is requested that you provide dates for mediation statements and for the conducting of a mediation.

In the interim, the parties will continue settlement discussions. In the event a settlement is reached before the settlement conference, we will notify the court promptly.

Thank you for your anticipated cooperation in this regard.

Very truly yours,
HOROWITZ LAW GROUP, LLC

A handwritten signature in blue ink, appearing to read 'SBH', is written over a horizontal line.

Steven B. Horowitz, Esq.
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SBH/bhs

Cc: Abdul K. Hassan, Esq. (via ECF only)
Liberty Ashes, Inc. (via email only)